BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Application by SBC Communications, Inc.	)	
Southwestern Bell Telephone Company, and	)	
Southwestern Bell Long Distance for	)	CC Docket No. 97-121
Provision of In-Region, InterLATA Services	)	
in Oklahoma	)	

AFFIDAVIT OF
CYNTHIA K. MEYER
ON BEHALF OF
SPRINT COMMUNICATIONS COMPANY L.P.

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

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AFFIDAVIT OF CYNTHIA K. MEYER ON BEHALF OF
SPRINT COMMUNICATIONS COMPANY L.P.

I, Cynthia K. Meyer, being first duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Cynthia K. Meyer. I am employed by Sprint Communications Company L.P. (Sprint) as Director - Local Market Development. In this capacity, I have led Sprint's effort to negotiate an interconnection agreement with Southwestern Bell Telephone Company (SWBT).

2. I have a B.S. in Civil Engineering from Kansas State University and an M.B.A. from Rockhurst College. I began working in the telecommunications industry in 1977 with Southwestern Bell Telephone, where I rotated through several management positions in numerous network department areas. These included outside plant engineering, switching engineering, long-range facility planning, and construction budget management. In 1983, I transferred to AT&T Communications as a manager in the State Pricing department. In that role, I was responsible for managing regulatory processes to introduce new and enhanced intrastate services and to minimize expenses through intrastate access rate intervention. In 1990, I joined Sprint's Long Distance division to manage access interconnections for the western United States. Shortly thereafter, I took

over management of Sprint Access Service product development. In 1996, I became the Local Market Development Director responsible for negotiating Sprint's terms for local market entry with Southwestern Bell Corporation and for successful execution of Sprint's local market entry in the Southwestern Bell states.

I. Purpose of Affidavit

3. My affidavit provides a view of local competition in Southwestern Bell Telephone Company's (SWBT) territory from the perspective of a competitive local exchange carrier (CLEC) who is working to achieve operational readiness for local market entry in Oklahoma. From this perspective, I will discuss operational parity as it relates to SWBT's operational support systems interfaces.

4. Merely having a contract with an incumbent local exchange carrier (ILEC) that agrees to provide operational parity is no guarantee that the ILEC can or will provide service in a manner that will allow the CLEC to be competitive in the local market. For a major CLEC, the transition from an executed interconnection agreement with an ILEC to being competitive in the local market is a long and complicated process that will take years. Local competition cannot be attained until facilities-based CLECs are operational and consumers have choices for local telephone service that are not ultimately controlled by the incumbent LEC.

II. Sprint - SWBT Interconnection Agreement Overview

5. Sprint recently signed an interconnection agreement (the Agreement) with SWBT in Oklahoma that would allow Sprint to purchase wholesale local services, rebundled local elements, and interconnection services from SWBT. However, there are two outstanding issues, listed as such in the Agreement, that the parties could not agree upon that may have to be resolved through the formal dispute resolution process. These issues were not known by Sprint at the time that it withdrew its arbitration request in Oklahoma. Sprint and SWBT are continuing to negotiate these two disputed issues which Sprint believes are critical to operational parity.

6. Sprint signed the Agreement with express reservations that numerous terms would have to be changed. Sprint does not believe, for example, that the Agreement contains service pricing (wholesale, unbundled, interconnection, or otherwise) that will allow Sprint to effectively price compete with SWBT for the same local customers. However, in the interest of spending less time talking and more time getting operationally ready, Sprint has agreed to the prices contained in the Agreement with the understanding that the prices are all interim and that those rates will be revised pending the results of SWBT cost proceedings by the Oklahoma Corporation Commission and/or pursuant to Section 252(i). Additionally, Sprint allowed certain unfavorable terms and conditions to be listed in the Agreement with the understanding that Sprint can request revision of these terms and conditions should SWBT agree to more favorable terms and conditions with other CLECs in the future.

7. I believe that Sprint's Agreement with SWBT is only the beginning framework for obtaining services from SWBT that are provided in a manner that is at parity with how SWBT provides the services to itself and others. It is quite clear, however, that there are problems with the Agreement in terms of operational parity from a local service provisioning and maintenance standpoint. Once this and the issues discussed above are resolved, numerous other checklist items contained in the Agreement will require substantial work between SWBT and Sprint before real interconnection can occur under the Agreement.

III. Operations Support Systems and Operational Parity

8. The competitive checklist in Section 271(c) of the Federal Telecommunications Act of 1996 (Act) includes nondiscriminatory access to network elements. Operations Support Systems (OSSs) have been defined as a network element by the Federal Communications Commission (FCC) in its First Report and Order in C.C. Docket No. 96-98 (issued August 8, 1996). More specifically, SWBT has an obligation to provide new entrants nondiscriminatory access to the systems utilized for the various OSS functions, such as pre-ordering, ordering and provisioning, maintenance and repair, recording of usage detail and billing.

9. It is insufficient for ILECs to offer CLECs access and interconnection to their services and elements and say, "Come and get it." For local competition to occur, ILECs must provide CLECs with interfaces to those services. These interfaces must enable CLECs to provide services to their customers at least equal in quality and timeliness to that

offered by ILECs to their customers. Enabling goes beyond the ILECs just committing to provide the CLECs the same level of service which they provide their end users today. Enabling means that the ILECs must provide the same level of service which they provide themselves internally for provisioning end user service. The ILECs should treat the CLECs as the large customers that they are or will be and provide communication and cooperation to make the ILEC services work for the CLECs in a sustainable and seamless manner.

10. Operational parity and non-discriminatory treatment must be verifiable by CLECs through specific ILEC performance measurements. ILEC performance measurements on operational parity should compare what SWBT does for Sprint compared to what it does for other CLECs, compared to what it does for SWBT end users compared to what SWBT does for itself in the process of provisioning end user service. For example, how long it takes to install a local loop after SWBT internally requests one for its own purposes as compared to the length of time it takes for SWBT to install a local loop at a CLEC's request. Or, how quickly does SWBT notify itself (through database updates or reports to customer service) of a missed due date as compared to the speed SWBT notifies a CLEC of a missed due date and what percentage of due dates are missed for SWBT as compared to those missed for CLECs. SWBT should provide these performance measurements on a timely basis to Sprint and other CLECs.

11. Sprint's agreement with SWBT to have SWBT provide the framework for operational parity does not ensure that operational parity with SWBT can or will be attained. The necessary steps to go from the contractual agreement to operational

readiness are many and complex. This complexity is heightened when Sprint eventually moves from resold services to unbundled services and interconnection services because new processes and interfaces between Sprint and SWBT must be implemented. The Agreement is merely the first step in defining customer requirements. The next steps that require SWBT's cooperation for implementing operational readiness for Sprint's resold services include:

- designing the interfaces and processes to meet the customer requirements,
- building the interfaces and processes as designed and establishing network connectivity,
- Alpha testing all interfaces and processes under stress conditions to simulate what will happen when large volumes and various types of end user customers begin using Sprint's local services (which utilize SWBT's underlying services),
- correcting problems identified in Alpha testing,
- Beta testing how the systems work under stress conditions with a select number of "friendly" customers, and
- correcting problems identified in Beta testing prior to market launch.

12. Furthermore, local service operations have many functional components that require specific interfaces and processes between Sprint and SWBT. Using broad categorizations, these functional components are:

- pre-order information gathering while the customer is on-line to determine the customer's existing services and address verification, availability of new services, telephone number assignment, appointment scheduling for on-site installation and whether one is needed,
- placing orders for resold services and unbundled network elements, including, directory listings and establishment of directory assistance, operator assistance, and 911 services,
- obtaining provisioning information feedback (for example, order and due date confirmation, order completion status, and/or order jeopardy status),
- maintenance and repair, including testing, monitoring of service functionality, trouble-reporting, and repair status determination,
- obtaining CLEC call detail records for billing purposes, including, recording usage in detail that CLECs for billing end users and in the case of interconnection, other local exchange carriers.
- obtaining invoices of ILEC charges for proper validation of charges and remittance.

Each category must be dealt with separately and as a combination in the steps listed above.

13. Sprint is at the very beginning stage with SWBT to develop operation readiness for Sprint's local market entry. SWBT is beginning to design the interfaces to SWBT's

processes and operations support systems to meet Sprint's customer requirements as specified in the Agreement. While SWBT has offered several OSS interfaces for Sprint to place resold service orders, some of which appear to be the same which SWBT uses for its own orders, these interfaces have not been tested for CLEC services nor do they offer Sprint the ability to attain full operational parity with SWBT. I have outlined SWBT's interface options in Exhibit 1 to my affidavit and discuss them in greater detail later in my affidavit.

14. Operations support systems are the mechanized processes and databases that provide the functionality and information needed to provide and maintain telecommunications services to end user customers. These functions, as previously defined, include pre-ordering, ordering and provisioning, maintenance and repair, recording of usage detail, and billing.

15. The OSS interfaces are the connections and integrated processes that allow for the requests for functionality and information to flow between the CLECs' operations support systems and the ILECs' operations support systems. These connections can be done through various methods. In SWBT's case, the planned interface methods include facsimile machines with manual intervention, a graphical user interface (GUI) to the operations support systems, a GUI interface to proprietary middleware that accesses the operations support systems, tape transmission (TTRAN), electronic data interchange (EDI), and electronic bonding. Of these methods, the only ones that have potential for full

operational parity capability are EDI and electronic bonding. Neither EDI nor electronic bonding is operationally available today with SWBT.

16. The operations support system interfaces should have the following characteristics in order to be capable of offering Sprint operational parity:

- provide access to the same content of information that SWBT uses to provide local service to SWBT end users;
- provide access timing in the same manner with which SWBT can access the interface and information; for example, real-time access versus batch versus facsimile/manual;
- provide access to information and feedback with no less priority than SWBT has for that information and feedback for their end users' local service; for example, CLEC phone numbers and installation appointment assignments should utilize the same systems and obtain the same priority as those provided for SWBT's end user local service orders;
- are built to CLEC industry standards when set;
- allow for full system flow-through potential with no manual intervention from CLEC systems to ILEC systems to CLEC systems and so on;
- have been fully designed to meet interface requirements;
- have processes which have been fully documented for use by CLECs and SWBT;

- have been fully tested and accepted by CLECs for meeting interface requirements under various stress conditions; such as, high volumes and bursts of requests, multiple types of users;
- are operational with significant CLEC activity to confirm ability to perform and sustain operational parity requirements; and
- are equally supported by SWBT in terms of documentation, help assistance, maintenance, updates, and change notifications as the operations support system interfaces which SWBT uses for providing local service to their own end users.

17. It is important to Sprint that SWBT's OSS interfaces for CLECs conform to industry standards whenever possible because today, Sprint is a global telecommunications service provider and as such must take advantage of the opportunity to become a nationwide local service provider in order to preserve and grow its existing long distance customer base. As a nationwide provider of local service, Sprint will potentially have to interface with every ILEC and possibly every other CLEC. There are currently seven RBOCs, GTE, and over 1300 independent incumbent local exchange companies. Sprint will be significantly disadvantaged in a competitive local market from a time and cost perspective, if forced to develop numerous system interfaces and provide training for personnel to use the multitude of systems and processes. Likewise, the use of industry standards benefits the ILECs by virtue of having a standard set of CLEC customer requirements for operational interfaces.

18. It is important to Sprint that OSS interfaces provide full system flow-through because without full system flow-through, Sprint's orders either need to be re-keyed by SWBT representatives or re-keyed by Sprint's representatives after the initial order entry. The process of entering the same data more than once introduces several problems; such as, data entry errors, non-synchronized databases, and time delays. These problems can have serious negative effects on customer service and other areas of Sprint's local service business and its subsequent ability to compete in the local market.

IV. SWBT's OSS Interfaces and Operational Status

19. Sprint recently met with SWBT to discuss OSS interfaces and was provided current information on the status of SWBT's operations support systems and interfaces for CLECs. For obtaining pre-order information, SWBT offers a SWBT-developed GUI to SWBT's proprietary service order database, a GUI interface to SWBT middleware that accesses SWBT legacy systems, and planned access by an Electronic Data Interchange (EDI) based on yet-to-be-developed industry standards.

20. For resale orders, SWBT offers CLECs the options of placing orders by facsimile transmission with manual intervention to SWBT proprietary order systems, via a SWBT GUI to SWBT's proprietary order systems, or via yet-to-be-developed automated interfaces based on EDI version 7 industry standards. The only process offered for complex orders (20% of residential and 50% of business) are facsimile processes with manual input.

21. For unbundled network element and interconnection orders, SWBT offers facsimile processes with manual intervention and plans to build automated EDI interfaces

based on industry standards currently in development with the Ordering and Billing Forum (OBF).

22. For directory listing orders, SWBT offers facsimile processes with manual intervention and plans on developing automated systems for simple directory orders based on EDI industry standards.

23. For provisioning feedback, SWBT currently offers facsimile processes with manual intervention and plans to develop automated feedback processes per EDI version 7 standards.

24. For maintenance and repair, testing of SWBT services and facilities, and trouble-reporting by CLECs, SWBT offers a GUI to a SWBT proprietary system which was developed prior to local competition for use by large retail customers. Additionally, SWBT offers electronic bonding based on industry standards.

25. For providing CLEC call detail records, SWBT offers the information via Network Data Movers (NDM) in an industry standard format.

26. For billing CLECs, SWBT plans on using the same system that they use for billing SWBT end users, CRIS, and will transmit these bills to CLECs via paper copy or tape transmission. To a much lesser degree, SWBT plans on using some of their other billing systems which are in place today; such as, IBIS. IBIS is the billing system which SWBT uses for billing independent companies in traffic exchange situations today.

27. SWBT's current OSS interfaces do not meet Sprint's requirements. With SWBT's current incentive and desire to obtain interLATA relief, Sprint believes that it is

SWBT's intent to work with Sprint to meet these requirements. Exhibit 1 to this testimony summarizes Sprint's understanding of where SWBT stands with respect to each of Sprint's requirements for operational parity for each functional component of operational interface. As the Exhibit illustrates, there is no area of OSS interface functionality that meets Sprint's requirements for operational parity and in fact, the most optimistic date that operational parity with SWBT can be attained is probably late 1998.

28. There are some major limiting factors for SWBT systems to provide operational parity for resold services. Automated systems and interfaces for ordering resale services based on EDI version 7 industry standards need to be built. Industry standards for pre-order functions will most likely not be developed until 1998. SWBT can only test with one CLEC per quarter for implementation of electronic bonding for maintenance and repair. SWBT has not indicated to Sprint that any OSS interfaces processes are fully documented or tested (with the exception of facsimile). Finally, there is no way to confirm that operational parity can be attained until the OSS interfaces that are designed to provide parity have been fully tested, implemented, and sustained. In the case of SWBT, none of the parity interfaces have been fully implemented.

29. SWBT does not have any automated systems for OSS interface for unbundled network element services. Sprint is not aware of any SWBT systems for OSS interfaces that are currently designed, tested, or operational for CLECs to order, maintain, or accept billing for unbundled network elements from SWBT. SWBT is working with the industry

Ordering and Billing Forum (OBF) to develop the standards for these OSS interfaces. These interfaces are necessary for facilities-based competition to evolve.

30. Local competition cannot develop in Oklahoma with facilities-based local service providers as long as CLECs are predominantly dependent on SWBT or other ILECs for the services and facilities that underlie the CLECs' local services (as a result of using ILEC resold services or unbundled network elements). A CLEC's ability to react to customer requirements and changing technology trends are severely encumbered when the CLEC's sole supplier, who is also a major competitor, has control of what services are available, when, and at what level of service quality. By using SWBT's resold services, it will be very difficult for Sprint or any other CLEC to differentiate services in order to gain customer base from SWBT when SWBT possesses such competitive control.

31. Sprint intends to be a facilities-based local service provider as soon as possible. When Sprint does enter the local market in Oklahoma, it will be first as a reseller of SWBT services. Sprint will then transition to combinations of unbundled network elements with Sprint-owned facilities. Because Sprint plans on being a nationwide local service provider as opposed to a niche market provider, Sprint's facilities-based transition cannot economically occur until the Sprint local customer base grows and economies of scale are realized.

V. SWBT's Lack of Cooperation

32. Sprint has other strong concerns regarding SWBT's cooperation in its efforts to bring local competition to the Oklahoma consumer. SWBT has not been timely in providing information that Sprint has requested and needs in order to become operationally ready. As previously stated, SWBT has not provided Sprint any process flow diagrams or documentation on operational interface processes and has provided very limited OSS interface specifications. Additionally, over four months ago, Sprint sent SWBT a request for information which Sprint needs now for market entry planning; such as street address guides, current directory close dates, service availability by switch, etc. With the exception of the white pages directory close dates which were provided just two weeks ago, SWBT has not provided the information requested and just recently verbally provided Sprint with SWBT contact names for Sprint to call and request some of the information again. At no time has SWBT indicated that it considers any of Sprint's requests to be unreasonable. Nor has SWBT countered with a request for additional information which it needs from Sprint in order to respond. Sprint's current local market rollout schedule is overly dependent on SWBT's responsiveness to these information requests. Furthermore, Sprint expects to continue to identify other areas of information that will be needed for Sprint's local service provisioning with SWBT resold services.

33. As Sprint moves from resold services to unbundled network elements, the complexity of SWBT's service offerings increases from that associated with just resold services. Sprint's need for information from SWBT will increase with this increased

complexity. When utilizing unbundled network elements, a CLEC's ability to compete will be dependent on understanding how the ILECs' unbundled service elements work individually and combined, as well as, what elements are available and planned for the future.

34. It is particularly unclear even after completing an interconnection contract with SWBT as to what all of the potential SWBT-imposed charges are associated with unbundled network element services. SWBT has stated on numerous occasions that its contract with AT&T in Texas does not include all of these charges. SWBT also said months ago that it would provide Sprint a list of these missing rate elements, but has yet to do so. Planning to use unbundled network element services is nearly impossible when the complete list of elements required to provision the services and their associated costs are unknown. When Sprint asked for timeframe commitments on installation of unbundled network elements based on SWBT's own use of these elements in the provisioning of end user service today, SWBT would not provide any data because it does not sell unbundled network element service to SWBT end users. Thus the installation intervals which SWBT commits to provide are in some cases 5-10 days which are competitively unacceptable and most intervals are developed on a case-by-case basis at SWBT's discretion. SWBT has not provided sufficient information for Sprint to judge whether SWBT is providing these services and intervals non-discriminatorily. Of even greater concern to Sprint than how SWBT is responding to reasonable information requests today, is how SWBT's

responsiveness may worsen when SWBT's incentive for cooperation, interLATA relief, is realized.

35. There are other areas in which SWBT has failed to provide Sprint reasonable coordination necessary to enter the local market competitively. These areas include:

(a) SWBT will make no commitment on whether Sprint will be able to purchase under the Agreement any of SWBT's pending telecommunications product offerings or unbundled network enhancements that they plan on introducing in the near-term or long-term; for example, Advanced Intelligent Network (AIN) triggers, Asymmetric Digital Subscriber Lines (ADSL), or ADSL modems.

(b) Neither SWBT nor Southwestern Bell Yellow Pages (SWBYPS) will work with Sprint to obtain for Sprint a service arrangement for yellow pages service at parity with what SWBT has with SWBYPS.

VI. Conclusion

36. Sprint has an interconnection agreement with SWBT that will not allow Sprint to enter the Oklahoma local market meaningfully or successfully; several critical components remain contested and/or unresolved. Thus, the Agreement is only the beginning framework for Sprint's local market entry. A signed interconnection agreement between Sprint and SWBT does not mean that local competition exists today in SWBT territory.

37. Though SWBT offers operations support system interfaces that could provide Sprint some aspects of operational parity, these interfaces do not yet offer Sprint the ability to attain full operational parity because of the lack of full, real-time flow-through to Sprint's systems on an industry standard basis. Furthermore, these interfaces and processes have not been documented, tested, or implemented to confirm what they offer.

38. Finally, local service competition has not happened and will not happen in SWBT Oklahoma territory until consumers have viable choices for local service that are provided by local service providers that are not dependent on SWBT for facilities or services. This is not yet the case in Oklahoma.

State of Missouri)
)ss
County of Jackson)

VERIFICATION

I, Cynthia K. Meyer, first being duly sworn, states on my oath that I am Director - Local Market Development for Sprint Communications Company L.P. (Sprint). I am authorized to act on behalf of Sprint regarding the foregoing statement. I have read the aforesaid statement and I am informed and believe that the matters contained therein are true and correct to the best of my knowledge.

Dated: April 24, 1997.

Cynthia K. Meyer

Cynthia K. Meyer appeared, and being first duly sworn upon her oath stated that she is the Director - Local Market Development, that she signed the foregoing document in that capacity and the facts contained therein are true and correct according to the best of her knowledge.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal in the aforesaid county and state on the above date.

Notary Public

My Commission Expires:

SALLY J. WERTS
Notary Public - Notary Seal
STATE OF MISSOURI
Clay County
My Commission Expires: Oct. 3, 2000

OPERATIONAL PARITY CAPABILITY OF SOUTHWESTERN BELL OPERATIONS SUPPORT SYSTEMS INTERFACES as of 3/3/97

I	II	III	IV	V	VI	VII	VIII	IX	X	XI	XII
FUNCTION	OPERATIONAL INTERFACE METHOD	PARITY ACCESS - CONTENT?	PARITY ACCESS - TIMING?	PARITY ACCESS - PRIORITY?	CLEC INDUSTRY STD.?	SYSTEM FLOW-THROUGH POTENTIAL?	FULLY DESIGNED?	PROCESS DOCU-MENTED?	STRESS TESTED?	OPERA-TIONAL?	SUPPORTED?
Pre-Order Information	SWBT GUI to Proprietary Systems	Yes	Yes	Yes	No	No	Yes, early stages	No	No	No	Unknown
	GUI to Proprietary Middleware	Yes	Yes	Yes	No	Yes	No	No	No	No	Unknown
	Electronic Bonding	TBD	TBD	TBD	TBD-1998	Yes	No	No	No	No	Unknown
Resale Orders - Simple	FAX	Yes	No	Yes	No	No	Yes	No	No	Yes, small scale	Unknown
	SWBT GUI to Proprietary Systems	Yes	Yes	Yes	No	No	No	No	No	No	Unknown
	EDI v.7	Yes	No	Yes	Yes	Yes	No	No	No	No	Unknown
Resale Orders - Complex	FAX	Yes	No	Yes	No	No	Yes	No	No	Yes, small scale	Unknown
Unbundled Network Element Orders	FAX	Unknown	Unknown	Unknown	No	No	No	No	No	Yes, small scale	Unknown
	EDI v.7	Unknown	Unknown	Unknown	Yes	Yes	No	No	No	No	Unknown

EDI = Electronic Data Interchange
FAX = facsimile
FOC = Firm Order Confirmation
GUI = Graphical User Interface
NDM = Network Data Mover
N/A - not applicable
TBD = to be determined
TTRAN =tape transmission

OPERATIONAL PARITY CAPABILITY OF SOUTHWESTERN BELL OPERATIONS SUPPORT SYSTEMS INTERFACES as of 3/3/97

I	II	III	IV	V	VI	VII	VIII	IX	X	XI	XII
FUNCTION	**OPERATIONAL INTERFACE METHOD**	**PARITY ACCESS - CONTENT?**	**PARITY ACCESS - TIMING?**	**PARITY ACCESS - PRIORITY?**	**CLEC INDUSTRY STD.?**	**SYSTEM FLOW-THROUGH POTENTIAL?**	**FULLY DESIGNED?**	**PROCESS DOCU-MENTED?**	**STRESS TESTED?**	**OPERA-TIONAL?**	**SUPPORTED?**
Directory Orders - Simple	FAX	Yes	No	Yes	No	No	Yes	No	No	Yes, small scale	Unknown
	EDI v.7	Yes	Yes	Yes	TBD	Yes	No	No	No	No	Unknown
Directory Orders - Complex	FAX/Manual	Unknown	No	Unknown	No	No	Unknown	No	No	Possibly, small scale	Unknown
Provisioning Information (Feedback, FOCs, status, etc.)	FAX	No	No	Yes	No	No	Yes	No	No	Yes, small scale	Unknown
	EDI v.7	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Unknown
CLEC Maintenance and Repair	GUI to Proprietary System	No	No	No	No	Unknown	Yes	No	No	No	Unknown
	Electronic Bonding	TBD	TBD	TBD	Yes	Yes	Some	No	Unknown	No	Unknown
CLEC Call Detail Records	EMR Format, Variable NDM	No	No	Unknown	Some	Yes	Yes	Yes	No	Some	Unknown
Billing to CLEC	CRIS via TTRAN	N/A	N/A	N/A	No	No	Yes	Yes	No	Some	Unknown

EDI = Electronic Data Interchange
FAX = facsimile
FOC = Firm Order Confirmation
GUI = Graphical User Interface
NDM = Network Data Mover
N/A - not applicable
TBD = to be determined
TTRAN =tape transmission

COLUMN HEADING EXPLANATIONS

I	FUNCTION	the operational purpose which the interface facilitates achieving
II	OPERATIONAL INTERFACE METHOD	the type of interface used to retrieve, transmit, and receive information between Sprint and SWBT
III	PARITY ACCESS - CONTENT?	Does the interface method provide access to the same content of information that SWBT uses to provide local service to SWBT's end user?
IV	PARITY ACCESS - TIMING?	Does the interface method provide access timing at least equal to the timing with which SWBT can access the information and feedback from the operation support systems interface and information; for example, real-time access versus batch versus facsimile?
V	PARITY ACCESS - PRIORITY	Does the interface method provide access to information/feedback with no less priority than SWBT uses for their end users' local service; for example, CLEC installation appointment assignments should utilize the same systems?
VI	CLEC INDUSTRY STANDARD?	Was the interface method built or is planned to be built to CLEC industry standard?
VII	SYSTEM FLOW-THROUGH POTENTIAL?	Do the interfaces allow for full system flow-through potential with no manual intervention from CLEC systems to ILEC systems to CLEC systems and so on?
VIII	FULLY DESIGNED?	Have the interface methods been fully designed to meet requirements?
IX	PROCESS DOCUMENTED?	Have interface processes been fully documented for use by CLECs and SWBT?
X	STRESS TESTED?	Have the interfaces been fully tested with CLECs for meeting CLEC operational requirements under various stress conditions; such as, high volumes and bursts of requests, multiple types of users?
XI	OPERATIONAL?	Are the interface methods operational with significant CLEC activity to confirm the ability to perform and sustain operational parity requirements?
XII	SUPPORTED?	Are the interface methods equally supported by SWBT in terms of documentation, help assistance, maintenance, and updates as the operational interfaces and support systems which SWBT uses for providing local service to its end users?

ATTACHMENT B

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma	CC Docket No. 97-121

DECLARATION OF CARL SHAPIRO
ON BEHALF OF SPRINT

I. Qualifications and Purpose of Testimony

A. Qualifications

I am Carl Shapiro, the Transamerica Professor of Business Strategy and Professor of Business and Economics at the Haas School of Business and the Department of Economics, University of California at Berkeley. I also am a founder of The Tilden Group, an economic consulting company. My qualifications are described in the Appendix, which also includes a copy of my curriculum vitae.